



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7217 Lancaster Pike, Suite A  
Hockessin, Delaware 19707

April 18, 2014

Document Processing Desk (REGFEE)  
Ms. Linda Hollis  
BPPD (7511C)  
U.S. Environmental Protection Agency  
Crystal Mall 2, Rm 266A  
1801 South Bell Street  
Arlington, Virginia 22202-4501

Dear Ms. Hollis:

**Re: Prostim™ L, EPA Reg. No. 82437-6 Label and CSF Amendment**

Wagner Regulatory Associates, Inc., on behalf of K&W Agrichemicals, Inc., is herein requesting the Agency to approve the enclosed revised 'Basic CSF' for this product. Compared to the 'currently approved' Basic CSF, the revised formula contains the same amounts of active ingredients. However, there has been a significant change in the inert ingredients' composition of the product that favorably alters the product's product chemistry and label precautionary language.

The results of product chemistry tests with the revised formula compared to the product chemistry tests of the current formula show that the revised formula is not combustible. Therefore, the combustion hazard statement has been removed from the label submitted with this amendment. No other changes have been made to this label. In support of this request I have enclosed the following documents:

- Letter from K&W Agrichemicals, Inc. appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Amendment (8570-1)
- Revised Basic Confidential Statement of Formula, 2 copies
- A copy of the EPA currently approved basic Confidential Statements of Formula (8570-4)
- Revised labeling - 3 copies and CD
- Certification with Respect to Label Integrity
- Data Transmittal Document
- Three (3) copies of acute toxicity rationale for the revised formulation
- Three (3) copies of phys. Chem properties data
- Copy of receipt for payment of PRIA Category B680, \$1,215.75
- Copy of EPA approval of 75% waiver of PRIA fees for the initial application

On September 3, 2013 EPA approved a 75% waiver of the pesticide registration fee for the initial application of this product. As nothing has changed in the business structure of K&W Agrichemicals, Inc., we ask that the Agency extend this approval to this amendment. Please feel free to contact me via email at [cheryl@wagnerreg.com](mailto:cheryl@wagnerreg.com) or telephone at (302) 635-7290 if you have any questions or require additional information.

Respectfully submitted,



Cheryl Wagner  
Agent for K&W Agrichemicals, Inc.

## DATA TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

K & W Agrichemicals Inc.  
c/o Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707

2. Regulatory Action In Support Of Which This Package Is Submitted

Prostim L  
EPA Registration No. 82437-6  
Submission of revised basic formulation

3. Transmittal Date

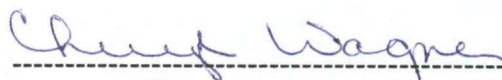
April 17, 2014

4. List of Submitted Studies

- Vol 1: Physical and Chemical Characteristics of Prostim L **49367701**  
Vol. 2: Product Identity, Composition, Description of Materials Used to Produce the **49367702**  
Product, Description of Manufacturing Process, Discussion of Formation of  
Impurities  
Vol. 3: Prostim L: Request and Rationale to Waive Certain Data Requirements **49367703**

**Company Official:**

Cheryl Wagner  
Agent for K & W Agrichemicals Inc.  
Name

  
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Signature

**Company Name:** K & W Agrichemicals Inc.

**Company Contact:** Cheryl Wagner  
Name

(302) 635-7289  
Phone